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Massamont Insurance Agency, Inc.

WESTCHESTER FIRE INSURANCE  
COMPANY, WESTCHESTER SURPLUS  
LINES INSURANCE COMPANY AND  
ILLINOIS UNION INSURANCE COMPANY,

Petitioners,

-against-

MASSAMONT INSURANCE AGENCY, INC.

Respondent.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Case No. 05-CV-5059 (D. Chin) ECF CASE

**RESPONSE TO MEMORANDUM OF LAW IN SUPPORT OF  
PETITION TO CONFIRM AWARD**

Respondent, Massamont Insurance Agency, Inc. ("Massamont"), hereby responds to the Memorandum of Law in Support of Petition to Confirm Arbitration Award by Petitioners, Westchester Fire Insurance Company ("Westchester Fire"), Westchester Surplus Lines Insurance Company ("Westchester Surplus") and Illinois Union Insurance Company ("Illinois Union" and, collectively "Petitioners"), filed in this matter by incorporating herein its responses contained in its Answer to Petition and requested relief set forth therein.

COLE, SCHOTZ, MEISEL,  
FORMAN & LEONARD, P.A.  
Attorneys for Respondent,  
Massamont Insurance Agency, Inc.

By: 

Sean M. Lipsky (SL 7676)

Dated: June 28, 2005